

REMARKS

The present application includes pending claims 1-33, all of which have been rejected. In particular, claims 1-23 and 25-33 stand rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. 2002/0016971 (“Berezowski”) in view of U.S. 2004/0125789 (“Parker”). Claim 24 stands rejected under 35 U.S.C. 103(a) as being unpatentable over Berezowski in view of Parker and U.S. 6,233,428 (“Fryer”). The Applicants respectfully traverse these rejections for at least the reasons previously discussed during prosecution and the following:

I. The Proposed Combination Of Berezowski And Parker Does Not Render Independent Claim 1 Unpatentable

Independent claim 1 recites, in part, “server software that maintains a user defined association of the first and second network addresses.” The Applicants respectfully submit that neither Berezowski, nor Parker, describes, teaches or suggests “server software that maintains a **user defined** association of the first and second network addresses [of the first and second set top box circuitries, respectively].”

The Office Action acknowledges Berezowski does not describe, teach or suggest this limitation. *See* April 4, 2008 Office Action at page 4. In order to overcome this deficiency, the Office Action relies on Parker.

Parker relates to “providing services (e.g., medical care and supervision) of a service requester (e.g., medical patient) by a service provider not in the same immediate location, and, more specifically, to a video telephony system for conducting communications supplemented by presenting digital data records to a service provider automatically in response to a video telephony call.” Parker at [0003]. “In particular, video telephony is coupled with automatic access to an electronic database of data records pertaining to the requester (e.g., patient) which are automatically displayed to the provider (e.g., caregiver).” *See id.* at [0008].

Parker discloses that telephone numbers and IP addresses are maintained by a server in a lookup table. In particular, Parker states the following:

Computer workstation 14 and set-top box 21 have pre-assigned data network addresses (e.g., IP addresses) enabling them to exchange network packets or datagrams over data network 13. A video telephony session of the present invention establishes a video communication link between the respective data network addresses, possibly with server relaying all packets between the two end-points. When requester 24 initiates a video telephony session, its initiating IP address is, of course, known. Unless the IP address of the service provider workstation is preconfigured into set-top box 21 and then specifically selected by requester 24, it is determined using server 35. Thus, set-top box 21 may be pre-configured with an IP address (or URL) of server 35, and computer workstation 14 registers in advance with server 35 providing its telephone number and IP address. Server 35 maintains this information in a lookup table so that a video communication link can be established in response to a message from the requester's set-top box 21 providing the IP address of set-top box and the telephone number of the service provider's workstation 10.

Id. at [0019]. This portion of Parker discloses that the server 35 maintains a lookup table of a requester's telephone number and IP address. This information is used to establish a video communication link in response to a message from the requester's set top box providing the IP address of the set-top box and the telephone number of the service provider's workstation. However, Parker does not describe, teach or suggest that either of the requester or the service provider define anything within the lookup table maintained by the server. Indeed, while Parker discloses that a patient's IP address is used to retrieve patient ID from the table, Parker does not describe, teach or suggest that the patient or the care provider define an association of any information within that lookup table. *See id.* at [0027] ("The request message includes a source IP address which identifies the corresponding patient communication device. Using that IP address, a patient ID for the patient assigned to a corresponding hospital bed or room is retrieved from table 59.") and [0028] ("the network address can be obtained by consulting a database that

translates an identifier (such as a telephone number) into an IP address”). There is nothing in Parker that discloses that either the requester (e.g., the patient) or the service provider (e.g., the care provider) define an association within the lookup table. Thus, neither Berezowski, nor Parker, describes, teaches or suggests server software that “maintains a user defined association of the first and second network addresses,” as recited in claim 1.

Thus, for at least these reasons, the Applicants respectfully submit that proposed combination of Berezowski and Parker does not render claims 1-12 unpatentable.

II. The Proposed Combination Of Berezowski And Parker Does Not Render Independent Claim 13 Unpatentable

Independent claim 13 recites, in part, “server software that maintains a user defined association of the first and second network addresses.” For at least the reasons discussed above, the Applicants respectfully submit that the proposed combination of Berezowski and Parker does not render claims 13-19 unpatentable.

III. The Proposed Combination Of Berezowski And Parker Does Not Render Independent Claim 20 Unpatentable

Independent claim 20 recites, in part, “maintaining a user defined association of a first network address with respect to a first location and a second network address with respect to a second location.” For at least the reasons discussed above, the Applicants respectfully submit that the proposed combination of Berezowski and Parker does not render claims 20-23 and 25 unpatentable.

IV. The Proposed Combination Of Berezowski And Parker Does Not Render Independent Claim 26 Unpatentable

Independent claim 26 recites, in part, “software that maintains a user defined association of the first and second network addresses.” For at least the reasons discussed above, the

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Applicants respectfully submit that the proposed combination of Berezowski and Parker does not render claims 26-33 unpatentable.

V. The Proposed Combination Of References Does Not Render Claim 24 Unpatentable

Claim 24 stands rejected under 35 U.S.C. 103(a) as being unpatentable over Berezowski in view of Parker and Fryer. The Applicants respectfully request reconsideration of this claim rejection for at least the reasons discussed above.

VI. Conclusion

In general, the Office Action makes various statements regarding claims 1-33 and the cited references that are now moot in light of the above. Thus, the Applicants will not address such statements at the present time. However, the Applicants expressly reserve the right to challenge such statements in the future should the need arise (e.g., if such statement should become relevant by appearing in a rejection of any current or future claim).

The Applicants respectfully request reconsideration of the claim rejections for at least the reasons discussed above. If the Examiner has any questions or the Applicants can be of any assistance, the Examiner is invited to contact the undersigned attorney.

The Commissioner is authorized to charge any necessary fees, or credit any overpayment to the Deposit Account of McAndrews, Held & Malloy, Account No. 13-0017.

Respectfully submitted,

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